

**REMARKS**

In the September 1, 2005 Office Action, the Examiner noted that claims 1-8 were pending in the application; rejected claims 5-8 under 35 USC § 102(e); and rejected claims 1-4 under 35 U.S.C. § 103(a). In rejecting the claims, U.S. Patents 6,658,625 to Allen (Reference A in the August 16, 2004 Office Action) and 6,626,957 to Lippert et al. (Reference A in the September 1, 2005 Office Action) were cited. Claims 1-8 remain in the case. The Examiner's rejections are traversed below.

**Rejection under 35 U.S.C. § 102(e)**

In item 3 on pages 2-3 of the Office Action, claims 5-8 were rejected under 35 U.S.C. § 102(e) as anticipated by Lippert et al. The only portion of the specification of Lippert et al. cited in rejecting claim 5 describes two ways of accessing a legacy database 300 (Fig. 3). The first is via interface 302 for "legacy clients knowledgeable of MAPI" (column 7, line 42). The second is via "engine 304 [which] may receive the content from the storage 300 ... in a predetermined format, and therefore must map the content to ... [a] format consistent with" (column 7, lines 48-51) XML. It is submitted that nothing cited in the claims of Lippert et al. would teach a person of ordinary skill in the art anything beyond what is disclosed in its specification.

The way that Lippert et al. discloses mapping the content into XML was not cited in rejecting the claims, despite the recitation in the body of claim 5 of "converting at least one of a plurality of kinds of requests into an extensible markup language format by referring to the database" (claim 5, lines 3-4). Column 5, line 46 to column 7, line 16 of Lippert et al. discloses a "Content Mapping Method," but the only citation to any portion of this disclosure was column 7, lines 1-16 of Lippert et al. which was cited in rejecting claim 8.

What is described in Lippert et al., including at column 5, line 46 to column 7, line 16, is conversion of data stored in a database in response to requests, not conversion of "**requests** into an extensible markup language format" (claim 5, lines 3-4, emphasis added) using a database, as recited in claim 5. Therefore, it is submitted that claim 5 and claims 6-8 which depend therefrom patentably distinguish over Lippert et al.

Furthermore, with respect to claim 8, it is submitted that the use of the word "schemas" in the statement "[t]his can be mapped to XML format as a singular mapping, urn:schemas:contacts:fileas 'Jones, Sally'" (column 7, lines 3-4) does not suggest the limitations recited in claim 8. Based on the examples in column 6, lines 58-63 "urn:schemas:contacts" is apparently just XML syntax. It is submitted that the use of the term "schemas" in XML does not

imply that a table was used to generate the XML in the manner recited in claim 8. Therefore, it is submitted that claim 8 further patentably distinguishes over Lippert et al. due to the additional limitations recited therein.

#### **Rejection under 35 U.S.C. § 103(a)**

In item 5 on pages 4-5 of the Office Action, claims 1-4 were rejected under 35 U.S.C. § 103(a) as unpatentable over Allen in view of Lippert et al. As discussed in the Amendment filed November 16, 2004, Allen discloses software executed by a client device to convert information into a format accepted by a server and then sending the data to the server. However, both independent claims 1 and 4 recite that "converting a plurality of kinds of requests into requests in an XML format" (claim 1, lines 3-4; claim 4, lines 5-6) is performed by "an information extraction device" (claim 1, line 1; claim 4, lines 3-4). It is submitted that the client device disclosed by Allen cannot constitute an information extraction device which receives "a plurality of kinds of requests" (e.g., claim 1, lines 3-4) impliedly from client systems for information from a database and uses the database to convert the requests into XML, extract information requested and return the results, as recited in claims 1 and 4.

Furthermore, it is submitted that Lippert et al. does not suggest modification of Allen to perform conversion of requests in "an information extraction device" as recited in claims 1 and 4. Lippert et al. does not indicate where engine 304 (Fig. 3) is located, but states that storage 300 can be "a hard disk drive, or can be a complete server computer" (column 7, line 25) and that interface 302 is "an application program interface" (column 7, lines 30-31) which typically runs on a client, not a server. This implies that engine 304 also runs on the client. In other words, the Examiner is apparently reading the teachings of the present invention into what is disclosed by Lippert et al. instead of determining what would be obvious to one of ordinary skill in the art from the combined teachings of the references. For the reasons discussed above, it is submitted that claims 1 and 4 and claims 2-3 which depend from claim 1 patentably distinguish over Allen in view of Lippert et al.

#### **Summary**

It is submitted that the cited references, taken individually or in combination do not teach or suggest the features of the present claimed invention. Therefore, it is submitted that claims 1-8 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

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Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450  
on JANUARY 3, 2006  
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Date: JANUARY 3, 2006